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*Counsel to the Ad Hoc Committee of Shareholders*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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|   |                           |
|---|---------------------------|
| In re:  | ) Chapter 11              |
|   | )                         |
|   | ) Case No. 20-11254 (JLG) |
| LATAM Airlines Group S.A., <i>et al.</i> , <sup>1</sup> | )                         |
|   | ) Jointly Administered    |
| Debtors.  | )                         |
|   | )                         |

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**VERIFIED STATEMENT OF GLENN AGRE BERGMAN & FUENTES LLP  
PURSUANT TO BANKRUPTCY RULE 2019**

In connection with the above-captioned Chapter 11 cases (the “Chapter 11 Cases”), Glenn Agre Bergman & Fuentes LLP (“Glenn Agre”) submits this verified statement (the “Verified Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy

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<sup>1</sup> The Debtors in these Chapter 11 Cases (as defined herein), along with the last four digits of each Debtor’s U.S. or local tax identification number (as applicable), are: LATAM Airlines Group S.A. (59-2605885); Lan Cargo S.A. (98-0058786); Transporte Aéreo S.A. (96-9512807); Inversiones Lan S.A. (96-5758100); Technical Training LATAM S.A. (96-847880K); LATAM Travel Chile II S.A. (76-2628945); Lan Pax Group S.A. (96-9696800); Fast Air Almacenes de Carga S.A. (96-6315202); Línea Aérea Carguera de Colombia S.A. (26-4065780); Aerovías de Integración Regional S.A. (98- 0640393); LATAM Finance Ltd. (N/A); LATAM Airlines Ecuador S.A. (98-0383677); Professional Airline Cargo Services, LLC (35-2639894); Cargo Handling Airport Services, LLC (30-1133972); Maintenance Service Experts, LLC (30-1130248); Lan Cargo Repair Station LLC (83-0460010); Prime Airport Services Inc. (59-1934486); Professional Airline Maintenance Services LLC (37-1910216); Connecta Corporation (20-5157324); Peuco Finance Ltd. (N/A); Latam Airlines Perú S.A. (52-2195500); Inversiones Aéreas S.A. (N/A); Holdco Colombia II SpA (76- 9310053); Holdco Colombia I SpA (76-9336885); Holdco Ecuador S.A. (76-3884082); Lan Cargo Inversiones S.A. (96-9696908); Lan Cargo Overseas Ltd. (85-7752959); Mas Investment Ltd. (85-7753009); Professional Airlines Services Inc. (65-0623014); Piquero Leasing Limited (N/A); TAM S.A. (N/A); TAM Linhas Aéreas S.A. (65- 0773334); Aerolinhas Brasileiras S.A. (98-0177579); Prismah Fidelidade Ltda. (N/A); Fidelidade Viagens e Turismo S.A. (27-2563952); TP Franchising Ltda. (N/A); Holdco I S.A. (76-1530348) and Multiplus Corredora de Seguros Ltda. (N/A). For the purpose of these Chapter 11 Cases, the service address for the Debtors is: 6500 NW 22nd Street Miami, FL 33131.

Rule 2019”) with respect to Glenn Agre’s representation of an ad hoc committee of shareholders of LATAM Airlines Group S.A. (the “Ad Hoc Committee of Shareholders”), and respectfully states as follows:

1. On or around May 19, 2021, certain members of the Ad Hoc Committee of Shareholders retained Glenn Agre to represent the Ad Hoc Committee of Shareholders in connection with the Chapter 11 Cases.

2. From time to time thereafter, certain additional members have joined the Ad Hoc Committee of Shareholders. As of the date of this Verified Statement, Glenn Agre represents the shareholders set forth in **Exhibit A**.

3. As of the date of this Verified Statement, Glenn Agre represents the Ad Hoc Committee of Shareholders and does not represent or purport to represent (i) any of the members of the Ad Hoc Committee of Shareholders in their individual capacity, or (ii) any entities other than the Ad Hoc Committee of Shareholders in connection with the Chapter 11 Cases. In addition, neither the Ad Hoc Committee of Shareholders nor any member thereof represents or purports to represent any other entities in connection with these cases.

4. The members of the Ad Hoc Committee of Shareholders have indicated to Glenn Agre that they hold disclosable economic interests or act as investment managers to funds and/or accounts that hold disclosable economic interests in relation to the above-captioned debtors (the “Debtors”). In accordance with Bankruptcy Rule 2019 and based upon information provided to Glenn Agre by each member of the Ad Hoc Committee of Shareholders, attached hereto as **Exhibit A** is a list of the names, addresses, nature, and amount of all disclosable economic interests of each present member of the Ad Hoc Committee of Shareholders in relation to the Debtors.

5. Nothing contained in this Verified Statement (or **Exhibit A** hereto) should be construed as a limitation upon, or waiver of, any rights of any member of the Ad Hoc Committee of Shareholders or Glenn Agre to assert, file, and/or amend any claim or proof of claim filed in accordance with applicable law and any orders entered in these Chapter 11 Cases.

6. The members of the Ad Hoc Committee of Shareholders and Glenn Agre reserve the right to amend or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

7. The undersigned verify that the foregoing is true and correct to the best of their knowledge.

*[Signature on Next Page]*

Dated: August 17, 2021  
New York, New York

*/s/ Andrew K. Glenn*

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Shai Schmidt

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*Counsel to the Ad Hoc Committee of Shareholders*

**Exhibit A**<sup>1</sup>

| <b>Name<sup>2</sup></b>   | <b>Address</b>  | <b>Approximate Number of Shares</b> | <b>Other Disclosable Economic Interests</b> |
|---|---|-------------------------------------|---|
| Two Seas Global (Master) Fund LP                                      | 32 Elm Place<br>3rd Floor<br>Rye, NY 10580                | 527,553                             | N/A   |
| Whitebox Multi-Strategy Partners, LP.                                 | 3033 Excelsior Blvd<br>Suite 500<br>Minneapolis, MN 55416 | 200,000                             | N/A   |
| Hampton Road Capital Management LP                                    | 1 Greenwich Plaza<br>3rd Floor<br>Greenwich, CT 06830     | 109,000                             | N/A   |
| Milestone Vimba Fund LP   | 3131 Campus Drive<br>Ste 100<br>Plymouth, MN 55441        | 154,000                             | N/A   |
| FourWorld Global Opportunities Fund, Ltd.                             | 7 World Trade Center<br>46th Floor<br>New York, NY 10007  | 1,000,000                           | N/A   |
| Funds managed, advised or controlled by Alta Fundamental Advisers LLC | 1500 Broadway, Suite 704<br>New York, NY 10036            | 283,897                             | N/A   |
| Patrick Conlin  | 3131 Campus Drive<br>Ste 100<br>Plymouth, MN 55441        | 50,000                              | N/A   |
| Adam Gui  | 1750 W Ogden #4106<br>Naperville, IL 60567                | 100,000                             | N/A   |

<sup>1</sup> To the best of Glenn Agre's knowledge, the information herein is accurate as of August 17, 2021.

<sup>2</sup> Each entity on this **Exhibit A** is listed either in its principal capacity or in its capacity as agent, investment advisor, or investment manager for certain investment funds or accounts or their respective subsidiaries that hold disclosable economic interests in relation to the Debtors.

|   |   |         |     |
|---|---|---------|-----|
| Kevin Barnes  | 4030 S. Whitehorse Road,<br>#408<br>Malvern, PA 19355                             | 58,000  | N/A |
| Jacob Mermelstein                                   | 6156 N St Louis<br>Chicago IL 60659   | 23,500  | N/A |
| Inversiones y Servicios Toledo SPA                  | Prat 2495 Vallenar, Chile   | 108,623 | N/A |
| Francisco Selman Kerestedjian                       | Yerbas Buenas 11636 Lo<br>Barnechea, Santiago, Chile                              | 70,684  | N/A |
| Inmobiliaria Selman S.A.                            | Yerbas Buenas 11636 Lo<br>Barnechea, Santiago, Chile                              | 30,000  | N/A |
| Andres Altamirano Medina                            | Camino Mirasol 1459 Casa<br>A, Las Condes, Santiago,<br>Chile                     | 24,908  | N/A |
| Jaime Duran Lopez                                   | Los Naranjos 18410, Maipu,<br>Santiago, Chile                                     | 34,000  | N/A |
| Patricio Araneda                                    | Suarez Mujica 2224, Ñuñoa,<br>Santiago, Chile                                     | 6,050   | N/A |
| Rene Aravena Vega                                   | Calle Huelen N° 154,<br>Departamento 21,<br>Providencia, Santiago Chile           | 522     | N/A |
| Inversiones Inmobiliarias y<br>Asesorias Giraq LTDA | Carlos Ossandon 391-Ñ,<br>Comunidad Los Almendros<br>De La Reina, Santiago, Chile | 229,000 | N/A |

|  |   |         |     |
|--|---|---------|-----|
| Inversiones Inmobiliarias y Asesorias Gabykar LTDA | San Alfonso 83, San Bernardo, Santiago, Chile   | 71,909  | N/A |
| Jaime De La Hoz                                    | San Alfonso 83, San Bernardo, Santiago, Chile   | 7,614   | N/A |
| Juan Pablo Prado Etcheverry                        | Avenida Doce 193, San Jose De Maipo, Chile      | 23,294  | N/A |
| Hugo Toledo Gonzales                               | La Serena Golf Casa 404, La Serena, Chile       | 15,000  | N/A |
| Mermelstein Investment Partners                    | 6500 N Hamlin<br>Lincolnwood, IL 60712          | 337,116 | N/A |
| Joel Mermelstein                                   | 6500 N Hamlin<br>Lincolnwood, IL 60712          | 9,250   | N/A |
| Daniel Mermelstein Remainder Trust                 | 3322 W. Arthur Avenue,<br>Lincolnwood, IL 60712 | 20,000  | N/A |
| Daniel & Ayelet Mermelstein                        | 3322 W. Arthur Avenue,<br>Lincolnwood, IL 60712 | 2,000   | N/A |
| Joshua Mermelstein                                 | 6500 N Hamlin<br>Lincolnwood, IL 60712          | 8,900   | N/A |
| Judith Aryeh                                       | 6500 N Hamlin<br>Lincolnwood, IL 60712          | 600     | N/A |